

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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YAIR ISRAEL BABAYOFF,

Plaintiff,

Case No. 20-CV-4538 (WFK)(RLM)

-v.-

NOTICE OF MOTION TO DISMISS

PRO COVERAGE GROUP, INC.,  
and BRANDON MARGOLIS,

Date of Service:  
June 9, 2023

Defendants.

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PLEASE TAKE NOTICE that upon the affirmation of defendant Brandon Margolis sworn to June 6, 2023, the accompanying Memorandum of Law, and Notice to Pro Se Plaintiff, and upon the pleadings and all proceedings heretofore had herein, defendants Pro Coverage Group, Inc. and Brandon Margolis will move this court before the Hon. William F. Kuntz, II, United States District Judge, at the Courthouse of the United States District Court for Eastern District of New York, located at 225 Cadman Plaza East Brooklyn, New York, on such day and time as counsel may be heard, for judgment on the pleadings pursuant to Fed. R. Civ. Pro. 12(b)(6) dismissing the amended complaint of plaintiff Yair Israel Babayoff in its entirety.

Dated: June 9, 2023  
Forest Hills, New York

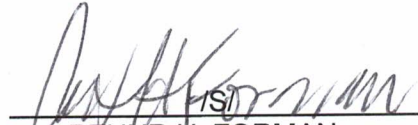
/S/  
ARTHUR H. FORMAN  
98-20 Metropolitan Avenue  
Forest Hills, New York 11375  
(718) 268-2616  
*Attorney for Defendants*

### DECLARATION OF SERVICE

Arthur H. Forman, pursuant to 28 USC §1746, declares under penalty of perjury that on June 9, 2023, he served the within (1) Notice of Motion to Dismiss, (2) Memorandum of Law in Support of Defendants' Motion to Dismiss, (3) Affirmation in Support, and (4) Notice to Pro Se Plaintiff, on the *pro se* plaintiff by U.S. 1<sup>st</sup> Class Mail and by email, as follows:

Yair Israel Babayoff  
69-09 138<sup>th</sup> Street, Apt. #3D  
Flushing, NY 11367  
Yad14llc@msn.com

Dated: June 9, 2023  
Forest Hills, New York

  
ARTHUR H. FORMAN